

**STATEMENT OF BASIS (AI No. 4230)**

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0080446** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

**THE APPLICANT IS:** Weyerhaeuser Company  
Taylor Sawmill  
1643 Highway 80 West  
Taylor, Louisiana 71080

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Paula M. Roberts  
Water Permits Division  
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**DATE PREPARED:** March 6, 2008

**1. PERMIT STATUS**

Reason for permit action: Reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

A. LPDES permit: Effective date – May 1, 2003  
Expiration date – April 30, 2008

B. Minor modification: Effective date – May 1, 2007  
Expiration date – April 30, 2008

C. Date Application Received: A renewal application was received on November 1, 2007.

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - Sawmill**

This applicant operates an existing sawmill facility. The applicant stores and debarks Southern Yellow Pine which is processed into wood chips and lumber and kiln dried prior to off-site transport for commercial use.

**B. FEE RATE**

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 2421

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- C. LOCATION – 1643 Highway 80 West, in Taylor, Bienville Parish (Latitude 32°32'43", Longitude 93°08'17")
- D. Technology Basis – 40 CFR Chapter I, Subchapter N (Effluent Guidelines and Standards) parts 401 and 405-471 have been adopted by reference at LAC 33:IX.4903.

<u>Guidelines</u>	<u>Reference</u>
Barking	40 CFR Part 429, Subpart A
Wet Storage	40 CFR Part 429, Subpart I
Sawmills and Planning Mills	40 CFR Part 429, Subpart K

Other Sources of Technology Based Limits:

Current LPDES Permit (effective May 1, 2003)

LDEQ Wood Storage Guidance

LDEQ Stormwater Guidance [letter dated June 17, 1987, from J. Dale Givens (LDEQ) to Myron Knudson (EPA)]

Best Professional Judgment

**3. OUTFALL INFORMATION**Outfall 001

Discharge Type: East log spray pond overflow

Treatment: Settling pond

Location: At the point of discharge from the overflow pipe at the southeast corner of the East Pond, prior to combining with other waters (Latitude 32°32'36", Longitude 93°08'15")

Flow: Intermittent – 0.118 MGD

Discharge Route: Unnamed ditch, thence into Leatherman Creek

Outfall 002

Discharge Type: South log spray pond overflow

Treatment: Settling pond

Location: At the point of discharge from the overflow pipe at the southeast corner of the South Pond, prior to combining with other waters (Latitude 32°32'31", Longitude 93°08'27")

Flow: Intermittent – 0.097 MGD

Discharge Route: Unnamed ditch, thence into Leatherman Creek

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Outfall 003

Discharge Type: Treated sanitary wastewater

Treatment: Mechanical plant and chlorination

Location: At the point of discharge from the mechanical treatment facility, prior to combining with other waters (Latitude 32°32'32", Longitude 93°08'19")

Flow: 1750 GPD

Discharge Route: Unnamed ditch, thence into Leatherman Creek

Outfall 004

Discharge Type: Low contamination potential stormwater runoff and saw blade cooling water

Treatment: None

Location: At the point of discharge from the drainage ditch, south of the paved area, prior to combining with other waters (Latitude 32°32'32", Longitude 93°08'19")

Flow: Intermittent – 0.1554 MGD

Discharge Route: Unnamed ditch, thence into Leatherman Creek

Outfall 005

Discharge Type: Stormwater runoff

Treatment: None

Location: At the point of discharge from the culvert southeast of the dry end building and east of the road, prior to combining with other waters (Latitude 32°32'34", Longitude 93°08'17")

Flow: Intermittent – 0.2698 MGD

Discharge Route: Unnamed ditch, thence into Leatherman Creek

**4. RECEIVING WATERS**

STREAM – Unnamed ditch, thence into Leatherman Creek

BASIN AND SUBSEGMENT – Red River Basin, Subsegment No. 100702

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DESIGNATED USES - a. primary contact recreation  
 b. secondary contact recreation  
 c. agriculture  
 d. fish and wildlife propagation  
 e. outstanding natural resource waters

The waterbody which is named as an Outstanding Natural Resource Waters in Subsegment 100702 is Black Lake Bayou. The discharges from the existing facility are to an unnamed ditch, thence into Leatherman Creek. This waterbody is not named as an Outstanding Natural Resource Water. In accordance with LAC 33:IX.1111, "designated uses of drinking water supply, oyster propagation and/or outstanding natural resource waters apply only to the waterbodies specifically named in Table 3 (LAC 33:IX.1123) and not to any tributaries and distributaries to such waterbodies which are typically contained in separate subsegments."

## 5. PROPOSED EFFLUENT LIMITS

Outfall 001 – East log spray pond overflow

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/12 months	Estimate	Current permit and LAC 33:IX.2701.1.1.b
COD	N/A	200	1/12 months	Grab	Current permit
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/12 months	Grab	Current permit and LAC 33:IX.1113.C.1

Outfall 002 – South log spray pond overflow

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/12 months	Estimate	Current permit and LAC 33:IX.2701.1.1.b
COD	N/A	200	1/12 months	Grab	Current permit
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/12 months	Grab	Current permit and LAC 33:IX.1113.C.1

Outfall 003 – Treated sanitary wastewater

Parameter	Monthly Average	Weekly Average	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/6 months	Estimate	Current permit and LAC 33:IX.2701.1.1.b
BOD <sub>5</sub>	30	45 mg/L	1/6 months	Grab	Current permit and Class I Sanitary General Permit

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Parameter	Monthly Average	Weekly Average	Monitoring Frequency	Sample Type	Reference
TSS	30	45 mg/L	1/6 months	Grab	Current permit and Class I Sanitary General Permit
Fecal Coliform *	200 COL/100 ml	400 COL/100 ml	1/6 months	Grab	Current permit and Class I Sanitary General Permit
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/6 months	Grab	Current permit and LAC 33:IX.1113.C.1

**\*Future water quality studies may indicate potential toxicity from the presence of residual chlorine in the treatment facility's effluent. Therefore, the applicant is hereby advised that a future Total Residual Chlorine limitations may be required if chlorine is used as a method of disinfection. In many cases, this becomes a NO MEASURABLE Total Residual Chlorine limit. If such a limit were imposed, the applicant would be required to provide for dechlorination of the effluent prior to discharge.**

Outfall 004 – Low contamination potential stormwater runoff and saw blade cooling water

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/month	Estimate	Current permit and LAC 33:IX.2701.1.1.b
COD	N/A	Report*	1/6 months	Grab	Current permit and LDEQ Wood Storage Guidance
Oil & Grease	N/A	15 mg/L	1/month	Grab	Current permit and LDEQ Wood Storage Guidance
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/month	Grab	Current permit and LAC 33:IX.1113.C.1

**\*Daily Maximum of 250 mg/l will be used as an action level requiring further response as described in Section 13 for Pollution Practices to be instituted by the facility to reduce any potential degradation to the receiving stream due to high COD levels.**

Outfall 005 – Stormwater runoff

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Reference
Flow	Report	Report	1/3 months	Estimate	Current permit and LAC 33:IX.2701.1.1.b
TOC	N/A	50 mg/L	1/3 months	Grab	Current permit and LDEQ Stormwater Guidance
Oil & Grease	N/A	15 mg/L	1/3 months	Grab	Current permit and LDEQ Stormwater Guidance
pH	6.0 S.U. (min)	9.0 S.U. (max)	1/3 months	Grab	Current permit and LAC 33:IX.1113.C.1

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### 6. PROPOSED CHANGES

- A. In an effort to adequately evaluate the discharges from Outfall 001, a provision has been added to the reopener clause in Part II, Paragraph I of the draft permit. This provision requires the facility to submit analytical data for these outfalls (with the exception of TOC, Oil & Grease, and pH for Outfall 001) within one (1) year after the effective date of the permit in accordance with LAC 33:IX.2511.C.1.a.v. Upon submittal of the analytical data, the LDEQ may choose to modify this permit to change the effluent limits based on this information.
- B. The facility discharges to a Water Quality Act 303(d) stream. Therefore, a reopener clause has been added to Part II of the draft permit in the event that the permit requires reassessment regarding 303(d) status resulting in cooperation of the results of any Total Maximum Daily Load (TMDL) allocation for the receiving water body.
- C. Updated Part II conditions for stormwater discharges associated with industrial activities have been established in the draft permit.
- D. The monitoring frequency at Outfall 003 has increased to 1/6 months from 1/12 months to be consistent with the basis for the sanitary limits which is in accordance with the Class I Sanitary General Permit.

### 7. COMPLIANCE HISTORY/DMR REVIEW

- A. There are no open, appealed, or pending enforcement actions for this facility.
- B. A DMR review for the period beginning December 2005 through December 2007 revealed no excursions.
- C. The last compliance inspection was performed on July 24, 2003. There were no areas of concern noted. All QA/QC procedures and DMRs were satisfactory.

### 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment No. 100702 of the Red River Basin has not been identified by the U.S. Fish and Wildlife Service as habitat for any endangered species. This type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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### 9. HISTORIC SITES

The discharges are from an existing facility, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

### 10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

### 11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper(s) of general circulation

Department of Environmental Quality Public Notice Mailing List

### 12. 303(d) ISSUE

Subsegment 100702, Black Lake Bayou-Webster-Bienville Parish Line to Black Lake (Scenic) is listed on LDEQ's 2004 305 (b)/303(b) Integrated Report with FINAL EPA additions dated August 17, 2005 as fully supporting its designated uses of primary contact recreation, secondary contact recreation, agriculture, propagation of fish and wildlife and outstanding natural resource waters. However, the 305(b)/303(d) Integrated Report list organic enrichment/Dissolved Oxygen (EPA-Category 5) as an impairment at the recommendation of EPA. Therefore, the TMDL assessment for this impairment will be completed by EPA.

There is a draft TMDL for Dissolved Oxygen for Black Lake Bayou (100702), but it has not been finalized. Based upon the size and nature of the discharges, the Department has determined that there is little potential for these discharges to cause or contribute to the impairment of organic enrichment/Dissolved Oxygen. Therefore, in order to ensure that the integrity of the waterbody is maintained, limits for BOD5 and COD have been retained in this draft permit.

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**13. COD Action Level**

Any exceedance of the COD action level shall result in the following requirements:

1. The sampling frequency for COD shall increase from 1/6 months to 1/quarter. This increased sampling frequency shall continue until a sample demonstrates compliance with the 250 mg/l COD action level at which time the monitoring frequency shall return to 1/6 months.
2. A written status report describing the actions taken to ensure reductions in exceedances of the COD action level shall be submitted to this Office with the quarterly DMR reports.
3. The Stormwater Pollution Prevention Plan shall be updated to incorporate the actions described in Section (2) above.

**14. STORMWATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit since there is a potential for stormwater contamination from ancillary activities which include handling of lubricants and fuels.

The SWP3 shall be prepared, implemented and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of stormwater pollution and ensure the implementation of practices to prevent and reduce pollutants in stormwater discharges associated with industrial activity at the facility.

**15. REOPENER CLAUSE**

Please note, this existing facility is subject to Chapter 25 of the LAC 33:IX. and in accordance with the requirements of LAC 33:IX.2511.C.1.a.v., the permittee is required to submit quantitative data based on samples collected during storm events and collected in accordance with LAC33:IX.2501 from all outfalls containing a stormwater discharge associated with industrial activity. Therefore, for outfalls 004 and 005, the permittee shall submit analytical data for these two outfalls, no later than one year after the effective date of the permit. Upon submittal of this analytical data, LDEQ may choose to modify, or alternatively revoke and reissue this permit to change effluent limitations based on the results of the submitted data. This provision has been added to the permit located in Part II, Section I.